REMARKS

By this amendment and remarks, claims 1, 3, 9, 13 and 18 have been amended. Claims 1-21 are pending in the application. In view of the foregoing amendments and the remarks urged here, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

35 U.S.C. § 103 Rejections

The Examiner has rejected claims 1, 2, 6 and 8 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0133569 to Huang et al. ("Huang") in view of U.S. Patent No. 6,345,279 to Li et al. ("Li"). The Examiner has rejected claims 3-5, 9-11, 13-15 and 17-20 under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Li and further in view of U.S. Patent Application Publication No. 2001/0032254 to Hawkins ("Hawkins"). The Examiner has rejected claims 7, 16, 12 and 21 under 35 U.S.C. § 103(a) as being unpatentable over Huang in view of Li and further in view of U.S. Patent No. 6,704,024 to Robotham et al. ("Robotham").

Claims 1-2, 6 and 8:

Applicant has amended claim 1 to more particularly point out and distinctly claim the subject matter regarded as the invention. The present invention, as recited in amended claim 1, is directed to a method for transcoding web-page content for a limited-display computing device such as a handheld computer. The method includes a step for searching a retrieved web page document for more than one textual references to images that are directly adjacent to one another. As long as there are more than one textual reference to directly adjacent images, the method classifies this as an "image run." Subsequently, those images are used to generate a composite image which is scaled to meet the display requirements of the limited-display computing device.

Among the problems addressed by the invention is that modern web page documents use numerous small images to form composite images which are relevant to the user experience for

these web page documents. Other images on web page documents may not be as relevant for the user experience. For limited-display devices like handheld computers, the image display area is limited and, in certain cases, the bandwidth necessary for downloading these images may also be limited. By filtering out the non-relevant images, and scaling the composite images for the limited-display devices, the user experience on handheld computers displaying web page documents is enhanced. Since most web page documents do not tag the relevant images, the method of the present invention searches the retrieved web page documents for more than one textual references to images which signify adjoining images which are typically a part of a composite image.

Huang is directed to a method for transcoding web documents for a client device. However, Huang teaches extracting XML from a retrieved web document and transferring the web document to the client device by XML transfers. See paragraph 30. Additionally, Huang teaches that the XML transfer is categorized by the type of web document that is retrieved. The present invention has no such requirement. Further, Huang teaches transformation rules depending on the type of web document that is retrieved and further that users, by default, are denied transfer of images. See paragraph 35. Therefore, at the least, Huang, does not search for "more than one textual references to images that are directly adjoining," as is required by claim 1.

The shortcomings of the base reference are not overcome by Li. Li teaches replicating transcoded web content into a plurality of formats, depending on the client machine capabilities and transmitting the appropriate multimedia content to the client machine. Such replication of web content into a plurality of formats is not required by the present invention. The present invention, in one embodiment, transcodes web page through a proxy server at the time the document is requested by a handheld computer. Therefore, at the least, Li also fails to teach searching for a "sequence of textual references to images that are directly adjoining," as is required by claim 1.

Therefore, Applicant respectfully submits that a combination of Huang and Li does not teach or suggest every claimed feature of the invention. The prior art reference (or references)

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must teach or suggest all of the claim limitations. In re Vaeck, 947 F.2d 488 (Fed. Cir. 1991). Since a prima facie case of obviousness has not been set forth, Applicant respectfully submits that amended claim 1 is allowable over the cited references. Claims 2, 6 and 8, by their dependency on claim 1, are similarly allowable. Early notice to that effect is earnestly solicited.

Claims 3-5, 9-11, 13-15 and 17-20:

Applicant has amended claims 1, 3, 9, 13 and 18 to more particularly point out and distinctly claim the subject matter regarded as the invention. In particular, independent claims 1, 9 and 18 have been amended to recite a method for transcoding web-page content for a limited-display computing device such as a handheld computer. The method includes a step for searching a retrieved web page document for more than one textual references to images that are directly adjacent to one another. As long as there are more than one textual reference to directly adjacent images, the method classifies this as an "image run." Subsequently, those images are used to generate a composite image which is scaled to meet the display requirements of the limited-display computing device.

The present invention, as recited in independent claims 1, 9 and 18, is directed to a method for transcoding web-page content for a limited-display computing device such as a handheld computer. The method includes a step for searching a retrieved web page document for more than one textual references to images that are directly adjacent to one another. If the method finds such an "image run," those images are used to generate a composite image which is scaled to meet the display requirements of the limited-display computing device.

As stated above, among the problems addressed by the invention is that modern web page documents use numerous small images to form composite images which are relevant to the user experience for these web page documents. Other images on web page documents may not be as relevant for the user experience. For limited-display devices like handheld computers, the image display area is limited and, in certain cases, the bandwidth necessary for downloading these images may also be limited. By filtering out the non-relevant images, and scaling the composite images for the limited-display devices, the user experience on handheld computers displaying

web page documents is enhanced. Since most web page documents do not tag the relevant images, the method of the present invention searches the retrieved web page documents for sequences of textual references to images which signify adjoining images which are typically a part of a composite image.

Huang is directed to a method for transcoding web documents for a client device. However, Huang teaches extracting XML from a retrieved web document and transferring the web document to the client device by XML transfers. See paragraph 30. Additionally, Huang teaches that the XML transfer is categorized by the type of web document that is retrieved. The present invention has no such requirement. Further, Huang teaches transformation rules depending on the type of web document that is retrieved and further that users, by default, are denied transfer of images. See paragraph 35. Therefore, at the least, Huang, does not search for "more than one textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

The shortcomings of the base reference are not overcome by Li or Hawkins. Li teaches replicating transcoded web content into a plurality of formats, depending on the client machine capabilities and transmitting the appropriate multimedia content to the client machine. Such replication of web content into a plurality of formats is not required by the present invention. The present invention, in one embodiment, transcodes web page through a proxy server at the time the document is requested by a handheld computer. Therefore, at the least, Li also fails to teach or suggest searching for a "sequence of textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

Similarly, Hawkins is directed to transforming wireless queries and responses to internet protocol queries and responses. Hawkins, at the least, does not teach or suggest searching for a "sequence of textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

Therefore, Applicant respectfully submits that a combination of Huang, Li and Hawkins does not teach or suggest every claimed feature of the invention. The prior art reference (or references) must teach or suggest all of the claim limitations. In re Vaeck, 947 F.2d 488 (Fed.

Cir. 1991). Since a prima facie case of obviousness has not been set forth, Applicant respectfully submits that independent claims 1, 9 and 18 are allowable over the cited references. Claims 3-5, 10-11, 13-15, 17 and 19-20, by their dependency on claims 1, 9 and 18, are similarly allowable. Early notice to that effect is earnestly solicited.

<u>Claims 7, 16, 12 and 21:</u>

Applicant has amended claims 1, 9 and 18 to more particularly point out and distinctly claim the subject matter regarded as the invention. In particular, independent claims 1, 9 and 18 have been amended to recite a method for transcoding web-page content for a limited-display computing device such as a handheld computer. The method includes a step for searching a retrieved web page document for more than one textual references to images that are directly adjacent to one another. As long as there are more than one textual reference to directly adjacent images, the method classifies this as an "image run." Subsequently, those images are used to generate a composite image which is scaled to meet the display requirements of the limited-display computing device.

The present invention, as recited in independent claims 1, 9 and 18, is directed to a method for transcoding web-page content for a limited-display computing device such as a handheld computer. The method includes a step for searching a retrieved web page document for more than one textual references to images that are directly adjacent to one another. If the method finds such an "image run," those images are used to generate a composite image which is scaled to meet the display requirements of the limited-display computing device.

As stated above, among the problems addressed by the invention is that modern web page documents use numerous small images to form composite images which are relevant to the user experience for these web page documents. Other images on web page documents may not be as relevant for the user experience. For limited-display devices like handheld computers, the image display area is limited and, in certain cases, the bandwidth necessary for downloading these images may also be limited. By filtering out the non-relevant images, and scaling the composite images for the limited-display devices, the user experience on handheld computers displaying

web page documents is enhanced. Since most web page documents do not tag the relevant images, the method of the present invention searches the retrieved web page documents for sequences of textual references to images which signify adjoining images which are typically a part of a composite image.

Huang is directed to a method for transcoding web documents for a client device. However, Huang teaches extracting XML from a retrieved web document and transferring the web document to the client device by XML transfers. See paragraph 30. Additionally, Huang teaches that the XML transfer is categorized by the type of web document that is retrieved. The present invention has no such requirement. Further, Huang teaches transformation rules depending on the type of web document that is retrieved and further that users, by default, are denied transfer of images. See paragraph 35. Therefore, at the least, Huang, does not search for "more than one textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

The shortcomings of the base reference are not overcome by Li or Robotham. Li teaches replicating transcoded web content into a plurality of formats, depending on the client machine capabilities and transmitting the appropriate multimedia content to the client machine. Such replication of web content into a plurality of formats is not required by the present invention. The present invention, in one embodiment, transcodes web page through a proxy server at the time the document is requested by a handheld computer. Therefore, at the least, Li also fails to teach or suggest searching for a "sequence of textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

Robotham is directed to server-side rasterization of visual content for client machines. Robotham suggests that the client machine present the rasterized content, rather than the original or a transformation of web page documents. Robotham, at the least, does not teach or suggest searching for a "sequence of textual references to images that are directly adjoining," as is required by claims 1, 9 and 18.

Therefore, Applicant respectfully submits that a combination of Huang, Li and Robotham does not teach or suggest every claimed feature of the invention. The prior art reference (or

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references) must teach or suggest all of the claim limitations. In re Vaeck, 947 F.2d 488 (Fed. Cir. 1991). Since a prima facie case of obviousness has not been set forth, Applicant respectfully submits that independent claims 1, 9 and 18 are allowable over the cited references. Claims 7, 16, 12 and 21, by their dependency on claims 1, 9 and 18, are similarly allowable. Early notice to that effect is earnestly solicited.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections, and that they be withdrawn. The Examiner is invited to telephone the undersigned representative if an interview might expedite allowance of this application.

Respectfully submitted,

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